

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA
GOEDINGHAUS,

Plaintiffs,

v.

TRAMMELL S. CROW, JR., et al.
Defendants.

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Case No. 5:23-cv-00580-FB

Judge: Hon. Fred Biery

Date Action Filed: May 8, 2023 (transferred)

**SUPPLEMENTAL DECLARATION OF PATRICK B. NICHOLS IN SUPPORT OF
TRAMMELL S. CROW'S MOTION TO COMPEL AMENDED RESPONSES
TO INTERROGATORIES AND FOR AN AWARD OF THE
EXPENSES INCURRED IN BRINGING THE MOTION**

I, Patrick B. Nichols, declare as follows:

1. I am a partner at the law firm of Hawxhurst LLP, co-counsel of record for defendant Trammell S. Crow. I make this supplemental declaration in support of Mr. Crow's motion to compel amended responses to interrogatories and for an award of the expenses incurred in bringing the motion. I have personal knowledge of the facts stated herein, and if called upon to do so, I could and would testify truthfully and competently with respect thereto.

2. I am familiar with Hawxhurst LLP's billing practices, the rates charged Mr. Crow for this matter, and the time spent by me, Mr. Foltyn-Smith and Mr. Hawxhurst in preparing the motion to compel and related papers.

3. Hawxhurst LLP charges the following rates for the attorneys staffed on this matter: Gerald E. Hawxhurst charges \$850 per hour for this matter. My hourly rate is \$745 for this matter. Mr. Foltyn-Smith charges \$650 per hour for this matter. I spent 0.8 hours reviewing and editing this reply and preparing my supplemental declaration. Mr. Foltyn-Smith

spent 2.1 hours researching and preparing the reply papers. Mr. Hawxhurst spent 0.4 hours preparing this motion and related papers.

4. In total, Mr. Crow incurred \$2,301.00 in attorney's fees for this motion and related papers. These amounts do not include the hours of attorney time spent reviewing plaintiffs' amended responses to interrogatories or sending emails and conferring with plaintiffs in order to obtain their compliance with the discovery rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in the City and County of Denver, Colorado, on the 8th day of April 2024.


Patrick B. Nichols